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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:20-mj-00282-VCF

Plaintiff,

Stipulation for an Order Directing Probation to Prepare a Criminal History Report

CESAR FONTANELLI-ROJAS,

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.

Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, and Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Defendant Cesar Fontanelli-Rojas, that the Court direct the United States Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The defendant has elected to review the government's Fast Track offer to resolve this matter. If he accepts this offer, the parties will jointly request a change of plea.

and sentencing hearing date 45 days from the defendant's execution of the proposed plea agreement.

2. The United States Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the United States Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance.

3. The United States Probation Office informs the government that it would like to begin obtaining the defendant's criminal history now so that it can complete the Presentence Investigation Report by the time of the expected change of plea and sentencing hearings.

Accordingly, the parties request that the Court enter an order directing the United States Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 21th day of April, 2020.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

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NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender
Counsel for Defendant
CESAR FONTANELLI-ROJAS

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1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No. 2:20-mj-282-VCF

4 Plaintiff,

**Order Directing Probation to Prepare
a Criminal History Report**

5 v.

6 CESAR FONTANELLI-ROJAS,

7 Defendant.

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10 Based on the stipulation of counsel, good cause appearing, and the best interest of
11 justice being served:

12 IT IS HEREBY ORDERED that the United States Probation Office is directed to
13 prepare a report detailing the defendant's criminal history.

14 DATED this 21st day of April, 2020.



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16 HONORABLE CAM FERENBACH
17 UNITED STATES MAGISTRATE JUDGE

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